

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY,
SYLVIA DAY, JONATHAN FRANZEN,
JOHN GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA
ROBINSON, GEORGE SAUNDERS,
SCOTT TUROW, and RACHEL VAIL,
individually and on behalf of others similarly
situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC,
OPENAI GP LLC, OPENAI LLC, OPENAI
GLOBAL LLC, OAI CORPORATION LLC,
OPENAI HOLDINGS LLC, OPENAI
STARTUP FUND I LP, OPENAI STARTUP
FUND GP I LLC, OPENAI STARTUP
FUND MANAGEMENT LLC, and
MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-08292-SHS

JONATHAN ALTER, KAI BIRD, TAYLOR
BRANCH, RICH COHEN, EUGENE
LINDEN, DANIEL OKRENT, JULIAN
SANCTON, HAMPTON SIDES, STACY
SCHIFF, JAMES SHAPIRO, JIA
TOLENTINO, and SIMON WINCHESTER,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI
HOLDINGS, LLC, and MICROSOFT
CORPORATION,

Defendants.

Case No. 1:23-cv-10211-SHS

**NOTICE OF MOTION FOR VOLUNTARY DISMISSAL
OF PLAINTIFF MAYA SHANBHAG LANG**

Pursuant to Rule 41(a)(2) and Rule 21 of the Federal Rules of Civil Procedure, Plaintiff Maya Shanbhag Lang respectfully requests leave to withdraw as a plaintiff in the above-captioned consolidated action without prejudice, and likewise preserving her rights as an absent class member.

Personal and family reasons preclude Ms. Lang's ongoing participation as a party to this action and putative class representative. It is well-established in this Circuit that a plaintiff may withdraw absent *substantial* prejudice to the defendant. Here, at this stage of the case, with no discovery orders outstanding or any dispositive or Rule 23 motions filed, Defendants have shown no prejudice at all and will suffer none.

Accordingly, Plaintiffs move the Court to grant permit Ms. Lang's unconditional withdrawal.

Date July 29, 2024

/s/ Rachel Geman

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Interim Co-Lead Class Counsel

CERTIFICATE OF SERVICE

I, Wesley J. Dozier, hereby certify that on July 29, 2024, I caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Southern District of New York using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Wesley J. Dozier _____
Wesley Dozier